



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

IN THE MATTER OF:) CAUSE NO. 3:22 CV 059262 DGE
)
Alejandro Calderon)
)
PLANTIFF) RESPONSE TO MOTION
) TO DISMISS #2
)
Vs.)
Linebarger Goggan Blair & Sampson, LLP)
)
DEFENDANTS)

For the reasons stated below, Plaintiff Alejandro Calderon, moves the court to issue order regarding initial disclosures, Joint status report, Discovery, Dispositions, and Early Settlement plan.

RESPONSE TO MOTION

1. The Court has the discretion to hold my complaint not to the standard of an attorney but, to one of a least sophisticated consumer.

1 2. The defendant's counsel argues that Linebarger Goggan Blair & Sampson, LLP is
2 not collecting a debt. What are collecting? Who is he collecting it from ? ...as
3 defined in the FDCPA the plaintiff is a consumer.

4 3. The defendant's counsel argues that Linebarger Goggan Blair & Sampson, LLP is
5 not debt collector. If one applies the" principal purpose test" or the "regularly
6 collects test" under which test does the defendant's counsel apply to define the
7 term debt collector.

8
9 The defendant's counsel arguments fail by devolving to excluding
10 Linebarger Goggan Blair & Sampson, LLP own statements as shown in exhibits F
11 and G. It reveals the bankruptcy of their position.

12
13 Dated February 14, 2023

14
15 

16 Alejandro Calderon
17 1309 E 58th St.
18 Tacoma, WA 98404
19

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2023, I mailed by United States Postal Service, First Class Mail, to:

Andrew D. Shafer, Esq.
KETTER SHEPPARD &
JACKSON, LLP
50 – 116th Ave. SE, Suite 201
Bellevue, Washington 98004

the following documents:

Response to motion to dismiss #2.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true, correct and complete, to the best of my knowledge.

Dated this 14 day of February 2023 at Tacoma, Washington.

Alejandro Calderon
1309 East 58th Street
Tacoma Washington 98404

A handwritten signature in black ink, appearing to read 'Alejandro Calderon', with a stylized flourish at the end.

To: Clerk of U.S. Dist. Court

Case # 3:22-cv-05962-DGE

FILED	LODGED
RECEIVED	
FEB 14 2023	
CLERK U.S. DISTRICT COURT	
BY WESTERN DISTRICT OF WASHINGTON AT TACOMA	
DEPUTY	